

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

ASHLEY T. ADAMS,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 05-249-KAJ
	)	
INTEGRITY STAFFING	)	
SOLUTIONS, et al.,	)	
	)	
Defendants.	)	

**DEFENDANT INTEGRITY STAFFING SOLUTIONS'  
ANSWER AND AFFIRMATIVE DEFENSES TO COMPLAINT**

Defendant Integrity Staffing Solutions, by and through its undersigned attorneys, hereby responds to the Complaint of plaintiff Ashley T. Adams as follows:

1. The allegations in paragraph 1 of the Complaint state conclusions of law to which no response is required, and the same are therefore denied.
2. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 2 of the Complaint, and same are therefore denied.
3. Defendant admits that it has a place of business at 220 Continental Drive, Suite 102, Newark, Delaware, 19713-2107. Defendant denies that it is "also known as: Pepper Hamilton LLP" as Pepper Hamilton is counsel for defendant. Defendant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in paragraph 3 of the Complaint, and same are therefore denied.
4. Defendant admits that it staffed plaintiff on two temporary assignments at defendant JP Morgan Chase. Defendant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in paragraph 4 of the Complaint, and the same are therefore denied.

5. The allegations in paragraph 5 of the Complaint are denied.
6. The allegations in paragraph 6 of the Complaint state conclusions of law to which no response is required, and the same are therefore denied.
7. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 7 of the Complaint, and same are therefore denied.
8. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 8 of the Complaint, and same are therefore denied.
9. Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 9 of the Complaint, and same are therefore denied.
10. Defendant denies the allegations in paragraph 10 of the Complaint.
11. Paragraph 11 was omitted from plaintiff's Complaint.
12. Defendant admits only that the Charge of Discrimination (the "Charge") purportedly filed by Plaintiff with the Equal Employment Opportunity Commission is attached to plaintiff's Complaint. Defendant denies the facts as set forth in the Charge.
13. Defendant denies the allegations in paragraph 13 of the Complaint.
14. Defendant denies the allegations in paragraph 14 of the Complaint.

**First Affirmative Defense**

Defendant did not engage in any unlawful employment practices with respect to Plaintiff.

**Second Affirmative Defense**

Defendant's decisions with respect to plaintiff were made for legitimate, non-discriminatory reasons unrelated to her gender, race, color or national origin.

**Third Affirmative Defense**

Plaintiff was treated at all times in a legitimate non-discriminatory manner.

**Fourth Affirmative Defense**

The Complaint fails to state a claim upon which relief can be granted.

**Fifth Affirmative Defense**

Plaintiff is not entitled to some or all of the relief sought.

**Sixth Affirmative Defense**

Plaintiff has failed to mitigate some or all of her alleged damages.

**Seventh Affirmative Defense**

Defendant took prompt and adequate remedial action reasonably calculated to prevent any harassment.

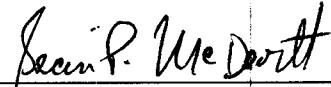
**Eighth Affirmative Defense**

Plaintiff unreasonably failed to take advantage of any preventative or corrective opportunities provided by defendant or to avoid harm otherwise.

WHEREFORE, defendant prays that plaintiff's claim for relief be denied, that the Complaint be dismissed in its entirety, and that judgment be entered in defendant's favor, together with costs and reasonable attorney's fees incurred herein, and any other relief as the Court deems just and proper.

Dated: June 20, 2005

Respectfully submitted,



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*Attorneys for defendant Integrity Staffing  
Solutions and Dawn Harper-Smith*

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**CERTIFICATE OF SERVICE**

I hereby certify that I caused two copies of defendant Integrity Staffing Solutions' Answer and Affirmative Defenses to Complaint to be served upon the following on the date set forth below, via first-class mail, postage prepaid:

Ashley T. Adams  
716 North Barrett Lane  
Christiana, DE 19702  
*Plaintiff*

Sheldon K. Rennie, Esq.  
Fox Rothschild LLP  
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Wilmington, DE 19899-2323  
*Attorneys for Defendants JPMorgan Chase  
Bank and Cheryl Denneny*

Ernst & Young  
5 Times Square  
New York, NY 10036  
*Defendant*

Randstad Staffing  
111 Continental Drive, Suite 201  
Newark, DE 19713-2107  
*Defendant*

Dated: June 10, 2005

  
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Sean P. McDevitt